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Michael A. Curtis
Susan D. Goodwin
Kelly Y. Schwab

The Law Offices of
**CURTIS, GOODWIN, SULLIVAN,
UDALL & SCHWAB, P.L.C.**

501 East Thomas Road
Phoenix, Arizona 85012-3205
Telephone (602) 393-1700
Facsimile (602) 393-1703
E-mail wsullivan@cgsuslaw.com
www.cgsuslaw.com

William P. Sullivan
Larry K. Udall
Phyllis L.N. Smiley
Trish Stuhan

ORIGINAL

Of Counsel
Joseph F. Abate
Patricia E. Ronan

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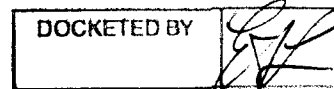
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July 7, 2014

Arizona Corporation Commission
DOCKETED

JUL 7 2014



Chairman Stump and Commissioners
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: Docket RU-00000A-14-0014

Proposed Rules Relating to Release of Customer Information

Dear Chairman Stump and Commissioners:

On behalf of Pueblo del Sol Water Company, Inc. ("PDS"), we respectfully request additional time (at least two additional weeks) to review and submit informal comments to the proposed Rules relating to the release of Customer Information. PDS received a copy of the proposed rules less than two weeks ago with a deadline for comments the Monday following the July 4th holiday. There is no explanation why the rules are being proposed or how they are intended to operate. It is unclear exactly what activities are "necessary to enable the utility directly or indirectly to provide the customer with any utility service and any utility product request by the customer or to which the customer has subscribed" under A.A.C. R14-2-2203 (B) 1 & 2. or who and how the determination is made. For example, is Opt-in Approval required to contract with a third-party bill collection agency? Must a customer specifically authorize the Company from disclosing the location of customer meters when coordinating road (or other) construction by a City, the County or the State or in order to comply with a provision of its City or County franchise?

Various requirements in the proposed Rules appear to cause PDS, and other water companies, to spend, what to them are significant sums, such as preparing and mailing annual reminders separately from any other utility communication (A.A.C. R14-2-2207), securing written opt-in and providing written confirmation thereof (A.A.C. R14-2-2205 & 2206), creating and maintaining a record of disclosure made pursuant to A.A.C. R14-2-2209 and notifying customers of such disclosures return request requested.

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PDS believes a workshop between Commission Staff and affected utilities explaining the purpose and operation of the proposed rules should be conducted as part of the informal comment process.

Very truly yours,

A handwritten signature in black ink, appearing to read 'William P. Sullivan', with a long horizontal flourish extending to the right.

William P. Sullivan
For the Firm

WPS/maw

cc: Rick Coffman